

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

GENEEN WILSON,

Plaintiff,

Case No.:

v.

ABILITY RECOVERY SERVICES, LLC,

Defendants.

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**NOTICE OF REMOVAL**

PLEASE TAKE NOTICE that, pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant, Ability Recovery Services, LLC (“ARS”), through undersigned counsel, hereby removes this action from the Lackawanna County Court of Common Pleas, State of Pennsylvania, to the United States District Court for the Middle District of Pennsylvania.

In support of this Notice of Removal, ARS states:

1. On August 8, 2023, Plaintiff, Geneen Wilson (“Plaintiff”), commenced a civil action in the Court of Common Pleas of Allegheny County, Pennsylvania, entitled and captioned *Geneen Wilson v. Ability Recovery Services, LLC*, Case No. 2023-3323 (hereinafter the “State Court Action”). No further proceedings before the State Court have occurred.

2. In the Complaint, plaintiff alleges a statutory cause of action against Defendant. A true and correct copy of the Complaint is attached hereto as Ex. “A.”

3. Plaintiff accuses Defendant of violating the Telephone Consumer Protection Act, 47 U.S.C. § 227, *et seq.*

4. Defendant received Plaintiff's Summons and Complaint on or about August 31, 2023.

5. This Court has jurisdiction over Plaintiff's claim pursuant to 28 U.S.C. §§ 1331 and 1441 in that the claim is founded upon a claim or right arising under the laws of the United States.

6. This Notice of Removal is timely, having been filed within thirty (30) days of the date on which Defendant received Plaintiff's Summons and Complaint. See 28 U.S.C. § 1446.

7. Written notice of this Notice of Removal of this action is being immediately provided to the Court of Common Pleas of Lackawanna County, Pennsylvania. *See* Ex. "B."

8. Written notice of this Notice of Removal of this action is being caused to be served on the Plaintiff.

WHEREFORE, Defendant Ability Recovery Services, LLC gives notice that this action is removed from the Court of Common Pleas of Lackawanna County, Pennsylvania, to the United States District Court for the Middle District of Pennsylvania.

Dated: September 27, 2023

Respectfully Submitted,

/s/ Aaron R. Easley  
Aaron R. Easley, Esq. (#73683)  
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*Attorney for Defendant,*  
*Ability Recovery Services, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 27, 2023 a copy of the foregoing was served on all counsel and parties of record electronically via CM/ECF and U.S. Mail.

Brett Freeman, Esq.  
FREEMAN LAW  
210 Montage Mountain Road  
Moosic, PA 18507

/s/ Aaron R. Easley  
Aaron R. Easley, Esq.